

**UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION**

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THOMAS G. BRUTON
CLERK, U.S. DISTRICT COURT

Anna Renee Burke)
)
)
)
)
)
(Name of the plaintiff or plaintiffs)

CIVIL ACTION

v.

NO. _____

The City of Chicago)
)
)
)
)
)
(Name of the defendant or defendants)

21cv5915
Judge John Z. Lee
Magistrate Judge Maria Valdez
RANDOM

COMPLAINT OF EMPLOYMENT DISCRIMINATION

1. This is an action for employment discrimination.

2. The plaintiff is Anna Renee Burke of the
county of Will in the state of Illinois.

3. The defendant is The City of Chicago, whose
street address is ~~30~~ 121 N. LaSalle St. Suite 600
(city) Chicago (county) Cook (state) IL (ZIP) 60602
(Defendant's telephone number) (312)-744-0200

4. The plaintiff sought employment or was employed by the defendant at (street address)

10/25/2021 and 10/25/2021 (city) Chicago
(county) Cook (state) IL (ZIP code) 60602

5. The plaintiff [*check one box*]

- (a) ☒ was denied employment by the defendant.
- (b) ☐ was hired and is still employed by the defendant.
- (c) ☐ was employed but is no longer employed by the defendant.

6. The defendant discriminated against the plaintiff on or about, or beginning on or about,

(month) October, (day) 25, (year) 2021.

7.1 (Choose paragraph 7.1 or 7.2, do not complete both.)

(a) The defendant is not a federal governmental agency, and the plaintiff [*check*

one box] ☒ *has not* filed a charge or charges against the defendant
☐ *has*

asserting the acts of discrimination indicated in this complaint with any of the following government agencies:

(i) ☐ the United States Equal Employment Opportunity Commission, on or about
 (month) _____ (day) _____ (year) _____.

(ii) ☐ the Illinois Department of Human Rights, on or about
 (month) _____ (day) _____ (year) _____.

(b) If charges *were* filed with an agency indicated above, a copy of the charge is

attached. ☐ YES. ☒ NO, **but plaintiff will file a copy of the charge within 14 days.**

It is the policy of both the Equal Employment Opportunity Commission and the Illinois Department of Human Rights to cross-file with the other agency all charges received. The plaintiff has no reason to believe that this policy was not followed in this case.

7.2 The defendant is a federal governmental agency, and

(a) the plaintiff previously filed a Complaint of Employment Discrimination with the defendant asserting the acts of discrimination indicated in this court complaint.

☐ Yes (month)_____ (day)_____ (year)_____

☐ No, did not file Complaint of Employment Discrimination

(b) The plaintiff received a Final Agency Decision on (month)_____
(day)_____ (year)_____.

(c) Attached is a copy of the

(i) Complaint of Employment Discrimination,

☐ YES ☐ NO, but a copy will be filed within 14 days.

(ii) Final Agency Decision

☐ YES ☐ NO, but a copy will be filed within 14 days.

8. *(Complete paragraph 8 only if defendant is not a federal governmental agency.)*

(a) ☒ the United States Equal Employment Opportunity Commission has not issued
a *Notice of Right to Sue*.

(b) ☐ the United States Equal Employment Opportunity Commission has issued a
Notice of Right to Sue, which was received by the plaintiff on
(month)_____ (day)_____ (year)_____ a copy of which
Notice is attached to this complaint.

9. The defendant discriminated against the plaintiff because of the plaintiff's [***check only those that apply***]:

(a) ☒ Age (Age Discrimination Employment Act).

(b) ☐ Color (Title VII of the Civil Rights Act of 1964 and 42 U.S.C. §1981).

- (c) ☐ Disability (Americans with Disabilities Act or Rehabilitation Act)
- (d) ☐ National Origin (Title VII of the Civil Rights Act of 1964 and 42 U.S.C. §1981).
- (e) ☒ Race (Title VII of the Civil Rights Act of 1964 and 42 U.S.C. §1981).
- (f) ☐ Religion (Title VII of the Civil Rights Act of 1964)
- (g) ☐ Sex (Title VII of the Civil Rights Act of 1964)
10. If the defendant is a state, county, municipal (city, town or village) or other local governmental agency, plaintiff further alleges discrimination on the basis of race, color, or national origin (42 U.S.C. § 1983).
11. Jurisdiction over the statutory violation alleged is conferred as follows: for Title VII claims by 28 U.S.C. §1331, 28 U.S.C. §1343(a)(3), and 42 U.S.C. §2000e-5(f)(3); for 42 U.S.C. §1981 and §1983 by 42 U.S.C. §1988; for the A.D.E.A. by 42 U.S.C. §12117; for the Rehabilitation Act, 29 U.S.C. § 791.
12. The defendant [*check only those that apply*]
- (a) ☒ failed to hire the plaintiff.
- (b) ☐ terminated the plaintiff's employment.
- (c) ☐ failed to promote the plaintiff.
- (d) ☐ failed to reasonably accommodate the plaintiff's religion.
- (e) ☐ failed to reasonably accommodate the plaintiff's disabilities.
- (f) ☐ failed to stop harassment;
- (g) ☐ retaliated against the plaintiff because the plaintiff did something to assert rights protected by the laws identified in paragraphs 9 and 10 above;
- (h) ☒ other (specify): I have not been able to get

hired as a speech-language pathologist to train law enforcement and fire about people with disabilities/communication disorders. I publicly offered at Chicago City Council meeting 10/25/2021, I sent my resume to Chicago Police, and tried to attend a Chicago police community zoom. This denies police in Chicago the ability to meet the Chicago police consent decree.

- See youtube video of city ^{Chicago} council Meeting 10/25/2021. I offered to develop policies and training on police services for individuals with disabilities to help the city of Chicago and Chicago Police meet the consent decree.
13. The facts supporting the plaintiff's claim of discrimination are as follows:
- I am living in Cook County transiently and have a permanent residence in Will County. I am unable to be hired by Chicago Police because I am 41 years old which is over their age limit and I am transient (they have a residency requirement currently). I also cannot figure out how to get hired as non-police to do disability training for Chicago Police to meet their consent decree.
14. **[AGE DISCRIMINATION ONLY]** Defendant knowingly, intentionally, and willfully discriminated against the plaintiff.
15. The plaintiff demands that the case be tried by a jury. ☒ YES ☐ NO
16. THEREFORE, the plaintiff asks that the court grant the following relief to the plaintiff [check only those that apply]

- (a) ☒ Direct the defendant to hire the plaintiff.
- (b) ☐ Direct the defendant to re-employ the plaintiff.
- (c) ☐ Direct the defendant to promote the plaintiff.
- (d) ☐ Direct the defendant to reasonably accommodate the plaintiff's religion.
- (e) ☐ Direct the defendant to reasonably accommodate the plaintiff's disabilities.
- (f) ☒ Direct the defendant to (specify): provide funding for

the Chicago Police for the consent decree.
 Hire me ^{other licensed professionals/professionals} to update/make it accurate about disabilities/communication disorders. Provide appropriate funding and services for trauma-

informed mental health care in Chicago to
meet the consent decree. Provide a budget
and FUND the consent decree.

- (g) ☒ If available, grant the plaintiff appropriate injunctive relief, lost wages, liquidated/double damages, front pay, compensatory damages, punitive damages, prejudgment interest, post-judgment interest, and costs, including reasonable attorney fees and expert witness fees.
- (h) ☒ Grant such other relief as the Court may find appropriate.

(Plaintiff's signature)

Anna R Burke

(Plaintiff's name)

Anna R Burke

(Plaintiff's street address)

14944 Cog Hill Lane

(City) Homer Glen (State) IL (ZIP) 60491

(Plaintiff's telephone number) (708) - 280-7038

Date: 11/3/2021